the information is not available, logical or descriptive. Such terms as: miscellaneous files, general files, desk files, old files, or office files are unacceptable descriptions. If the information on the side of each carton is not clear or has unacceptable descriptions, IM will review the contents of the carton for the information. If IM still has difficulty with obtaining carton data, IM will call RIM in a weekly phone call with cartons in front of them so they can review what they see to the RIM contact.

8. IM will capture date range (from and/or thru dates) for all cartons missing this information. The From date is the oldest date, and the Thru date is the newest date. If the dates are not clearly written on the outside of the carton, IM will obtain the date range from the record contents inside the carton. If there is no clear "day" but month and year can be supplied, the from "day" will be the first day of a month and the thru "day" will be the last day of the month. If there is no clear day or month, but a year can be supplied, IM will span the entire year for the date range (i.e., 01/01/99 - 12/31/99).

9. IM will capture descriptions for all cartons that are missing this information. In providing descriptions, IM will review the contents of the carton to obtain descriptive information of its contents. If there is any question as to what the description should be for any particular carton, IM will contact RIM on a weekly basis with the cartons in front of them so they can review what they see to the RIM contact.

   Examples are as follows:
   a. If a carton contains multiple types of records, and there is no one clear description for the carton contents, IM will call RIM for instructions.
   b. If IM determines that the contents of a carton are reports, IM may use the report name as a description, if the carton contains the same reports.
   c. If IM determines the contents of a carton are canceled checks, IM may use "Canceled Checks" as a description; however, IM must also capture the bank name (ex., Canceled Checks, Bank of America).
   d. If IM comes across cartons that contain postcard looking records, and it appears to be information regarding a customer requesting MCI services, IM should use the description of "Letters of Authorization" along with the program name that is on the front of the postcard.
   e. If IM comes across cartons containing files with just names on them, they will need to open the file to determine if they are payroll records, personnel records or customer records.
   f. If IM comes across cartons that contain various types of software manuals, the description should be "Software Application Manuals". If the cartons contain other types of system records, IM should be as descriptive as possible.

10. If IM comes across cartons that contain electronic media such as tapes, diskettes, microfiche or microfilm, IM will visually inspect the media to determine if it looks to be harmed in any way from being stored in the regular warehouse (i.e., rodent damage, water damage, heat damage which visibly shows melting, etc.). If

the media appears to be harmed, IM will inform RIM in their weekly status report along with barcode numbers and type of visible damage and descriptive data, if any. If the media appears to be fine, IM will put the carton of electronic media into climate control storage.

11. If IM comes across any cartons that contain office supplies, equipment, personal items, such as pictures, coffee mugs, or other non-record type cartons, IM will inform RIM in their weekly status report. RIM will follow-up with a message on what the disposition should be on the carton(s).

12. IM will fax completed inventory forms to RIM, on a daily basis, for review; RIM's fax number is: 703-886-0807. RIM will review the forms and assign record class codes. Any inventory form that is incomplete will NOT be assigned record class codes and will note the deficient area. Inventory forms will be reviewed within 72 hours of receipt by RIM and faxed back to IM. Only those forms with record class codes and stamped "Approved" by RIM should be entered to IM's system. Data entry will occur for cartons inventoried as the project progresses. All data for cartons that have had their inventory forms approved by RIM will be entered into IM's system within five business days of approval.

13. During RIM's review of the inventory form, if there is any question as to the validity of a description, RIM will contact IM's project supervisor. It will be IM's responsibility to go back and review the carton or inventory of its contents for a better description. Should IM experience difficulty in securing a description or other required information, RIM should be informed in the weekly status report.

14. During the inventory project, it is understood that IM may have to use new cartons for boxes that are deteriorating. IM will inform RIM in their weekly status report the number cartons that needed new boxes, if any. IM will carryover the barcode number from the old carton to the new one.

15. The inventory project will not be considered completed or finished until all data entry is completed; this includes the entry of record class codes for each carton, destruct review dates generated, and a full report mailed and received by RIM.

# MCI BOX INVENTORY PROJECT ESTIMATE REQUEST

**(For Cartons Currently in Iron Mountain Warehouse)**

**Date:**

**Expected IM Response Date:**

**Iron Mountain District:**

**Account #:**

**Request By:**

**Email:**

**Telephone:**

**Fax:**

**Address:**

**PURPOSE OF PROJECT:** The purpose of this project is to capture all missing data information and enter all identified data for cartons currently located in Iron Mountain's warehouse, as indicated on the attached inventory report, by MCI's Records & Information Management.

**Carton Inventory Request**:

**Number of Cartons that Need Dates Only:**

**Number of Cartons that Need Description Only:**

**Number of Cartons that Need Both Dates and Description:**

**Instructions**:

1. The attached listing shows data entries for either date range, record class or both. Please enter these into your database system along with any typo changes.

2. Per the attached inventory report, the cartons that need date range inventory only will have a highlight in the date range field. Cartons that need description inventory only will have the description area highlighted. Cartons that need a complete inventory for both date range and description will have the barcode number highlighted.

3. MCI expects that Iron Mountain will fulfill the scope and our requirements of this project as outlined in the attached Inventory Project Requirements and Expectations.

**Iron Mountain Estimate:**

**Project Start Date:** ____________________ **Project End Date:** ____________________

**Number of Hours:** ________________ **Number of People:** ________________________

**Type of Personnel to be Used (temporaries, contractors or permanent):** _______________

**Name of Project Supervisor:** ________________________________________________

**Phone Number of Project Supervisor:** __________________________________________

**E-mail of Project Supervisor:** ________________________________________________

**Location where Inventory Project will be performed:** ______________________________

**Fax Number where Approved Inventory Forms are to be sent:** ______________________

**Cost Breakdown:**

**Retrieval:** ________________________________________________________

**Refile:** ___________________________________________________________

**Supplies:** _________________________________________________________

**Labor (explain):** ___________________________________________________

**Other (explain):** ___________________________________________________

**Total Cost:** ______________________

**Estimate By:**

______________________________________________
(print name)

**Phone:** ______________________ **Fax:** ______________________

**Address:**

______________________________________________

**Email:**

______________________________________________

**Iron Mountain Signature & Date:**

______________________________________________

**MCI Approval By:**

______________________________________________
(print name)

**MCI Signature & Date:**

______________________________________________

## INVENTORY PROJECT PLAN FOR NEW JERSEY

**OBJECTIVE:** To ensure that all cartons currently located within the IM New Jersey warehouse contain all required data (date range, description and record class code) and that the data is entered into IM's computer system.

**SCOPE:** Identify all cartons that are missing, at least, one field of data information. IM will inventory cartons for any missing information, and RIM will provide record class codes where needed.

**PROCESS:**

1. Lisa will review the Inventory Report from IM New Jersey. Lisa will note cartons that need date range, description or both. Lisa will also note cartons where clarification on description is needed and make changes to record class codes as appropriate.

2. Lisa will forward Estimate Form, Inventory Report, and Project Requirements and Expectations to Phil Hasselvander so that he can make a copy of the package and then mail the original via overnight to Deborah Wood for response. Phil will also include a copy of the new Inventory Form in the package being sent to Deborah. Phil will keep a complete copy of the package within the department.

3. When the completed Estimate Request Form has been returned by IM, Phil is to seek approval of IM's estimate from Brenda Tate, and get her signature. Once signed, Phil will copy and send original to IM so that the inventory project can start.

4. Once the inventory project has begun, Phil will keep up on the status of the project through IM's weekly project status reports, and forward a copy to the other RIM members.

5. As faxed inventory forms are received, from cartons that have been inventoried, Phil will review the data information supplied, research and enter the record class codes, approve the inventory form and fax the form back to IM within 72 hours. Applying record class codes for the inventory project will take priority over regular day-to-day activities.

6. If there are problems with descriptions where Phil cannot give a record class code due to an incomplete description, Phil will contact the IM Project Supervisor immediately after reviewing the inventory forms. Phil will request that the carton be re-inventoried or have someone come to the phone with the carton in-hand and describe the carton contents. If Phil cannot figure out the contents of the carton, he should either connect Lisa into the call with IM, or request that the carton be permanently withdrawn and shipped to him.

7. If the carton is shipped to Phil due to problems with obtaining a description, Phil will review the contents once they are received. If the records have a retention

requirement, Phil will complete an inventory form for the carton, and have it stored in the D.C. area.

8. If cartons are identified as junk, supplies or other non-record type cartons, IM will inform Phil. The cartons will be shipped to Phil for disposition within MCI.

9. If problems continue regarding inadequate data information on the inventory forms, Phil will speak with Lisa regarding the problems. Phil and Lisa will contact the IM Project Supervisor and Deborah Wood regarding the issues.

10. Once the inventory phase of the project is complete and an inventory report is received, Phil and Lisa will review the report to ensure completion of the project.

11. Phil will also ensure that all data changes as marked on the inventory reports sent to Iron Mountain at the beginning of the project were made.

12. Once it has been determined by MCI that the project is complete, Phil will contact IM, in writing, informing them that we have determined that the project has been completed.

13. If problems occur during the inventory project, Phil will document all problems, in detail and in writing, to the Project Supervisor, Deborah Wood and Lisa regarding these problems.

# APPENDIX H

## Destruction Review Spreadsheet

## Destruction Review Memo

# Appendix I

# IRS Rev. Proc. 97-22

# and

# IRS Rev. Proc. 98-25

URLs:

Rev. Proc. 98-25 at: http://ftp.fedworld.gov/pub/irs-irbs/irb98-11.pdf. This is the IRS bulletin and it can be found on starting on page 7 through page 12.

Rev. Proc. 97-22: http://ftp.fedworld.gov/pub/irs-irbs/irb97-13.pdf - starting on Page 9 through page 11.

These bulletins load in Adobe.

# APPENDIX J

## Listing of HR Records being imaged

## LPP Approval Memo

## HR RECORDS AND IMAGING

MCI images the following personnel and benefit records at the Human Resources office in Denver.

Agreement Records:

| | |
|---|---|
| Data Security | Employee Reimbursement |
| Tuition Reimbursement | New Products, Ideas, etc. |
| Overpayment/Repayment | Confidentiality |
| Secrecy of Communications | Commissions Financial Forms |
| Relocation | |

I-9 Records:

| | |
|---|---|
| Application for SSN | Personal Data |
| I-9 Form | Employee Verification |

Job-Related Records:

| | |
|---|---|
| PAF/Salary Matrix | Transfer |
| Reclass | Adjustments |
| Promotion | New Hire |
| Leave of Absence | Termination |
| Merit | Rehire |
| Attendance Records | Warnings |

Benefits Records:

| | |
|---|---|
| Insurance | Medical Waiver |
| PIN Authorization | Benefits Enrollment |
| 401K | Emergency Contacts |
| GULP | Dental |
| Benefits Status Change | HMO/Org Change Form |
| ESPP | Beneficiary Forms |

Reviews/Performance Records

Payroll-related Records:

| | |
|---|---|
| Direct Deposit | Deduction Worksheet |
| Tax Forms | United Way Authorization |

Other Records:

| | |
|---|---|
| Address Change | Application |
| Offer Letter | Letter of Commendation |
| Resume | Monitoring Forms |

® Records Management has received approval from LPP to retain the above records on one imaging system (see Exhibit 13).

# APPENDIX K

Guide for New Acquisitions

Memo

Questionnaire

Records and Information Management

## *A Guide for New Acquisitions*

# Records Compliance Program

*Welcome Aboard.*

A Records & Information Management (RIM) Program is vital to MCI. As such, a records retention policy and program, as well as a formal Record Retention Schedule have been developed for company-wide use to minimize MCI's legal and financial risks. Each MCI employee is responsible for understanding the policy and complying with this *mandatory* program.

The definition of a record is any and all recorded information regardless of medium or specific characteristics, that is created, received, used or distributed by MCI in the course of business. This includes – but is not limited to: paper, microfilm, tape, microfiche, e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.

On top of everything else you will be doing to integrate your business within MCI, Records & Information Management (RIM) needs some information in order to ensure that there is a smooth transition of your records into MCI.

- A contact name and number of an individual that can assist in accessing all of your company's records.
- A list of all your business locations with full addresses and phone numbers. The list should also contain what record types are located in each location, in what media form, and whether that location is using off-site storage.
- If off-site storage is being used, please provide the name, location, account number, contact name and phone number of the off-site storage vendor; also, a copy of the contract, price listing and inventory report. This includes all storage locations; records management/storage companies, internal storage locations and self-storage facilities.
- A copy of your company's record retention program and procedures or something in writing indicating your company's records management.

While your records program is being evaluated by RIM, absolutely no records destruction of any kind can take place. While going through the transition, if you find that you are in need of offsite storage, please contact RIM.

Employees should be informed that any company records that are being used or retained in their homes, garages, cars, etc. must be returned to the office.

Until you are able to access MCI's intranet, attached you will find an overview of our records program and procedures, also the Records Retention Schedule (RRS) in PDF format. If you cannot access the PDF file contact RIM and a copy will be sent via first-class mail. Once you can access the company's intranet, you can become fully indoctrinated in to our Program via RIM's website at: https://teamnet2.mcilink.com/departments/rim/.

If you have any questions or concerns, please contact:
James Green, 703-886-3364, James.Green@mci.com
Joe Stephens, 703-886-3401, Joe.W.Stephens@mci.com
Phil Hasselvander, 703-886-3398, Philip.H.Hasselvander@mci.com
Darrell Daniels, 703-886-3378, Darrell.Daniels@mci.com
Christopher Moses, 703-886-7117, Christopher.Moses@mci.com
Michael Simms, 703-886-1252, Michael.L.Simms@mci.com
Charles McBride, 703-886-3831, Charles.Mcbride@mci.com
Brenda Tate, Sr. Manager of Audit & Control, 703-886-3538, Brenda.Tate@mci.com
Joyce Moultry, Manager, Records & Information Management, 703-886-3336, Joyce.Moultry@mci.com

Π *Throughout the attached guideline numerous references are made to the* RIM website. *If you do not have access to this website yet, and have need for offsite storage, please contact RIM and we will assist in providing services with the appropriate storage vendor.*

# TABLE OF CONTENTS

RECORDS MANAGEMENT PROGRAM OVERVIEW ........ 4

GUIDELINES
Adherence to the Records Program ........ 5
What is a Record? ........ 5
Vital Records ........ 5
The Records Retention Schedule (RRS) ........ 5
Record Series ........ 6
Locate the Records Series number associated with your record ........ 7
Locate a Record Series number using the website ........ 7
Destruction Review Date ........ 7
Off-Site Storage ........ 7
Storage vendors and services ........ 8
Handling instructions for paper, microform, electronic records ........ 8
Storage Procedures, Pick-up / Delivery Schedule ........ 9
New Storage ........ 10
Inventory Form ........ 10
Retrievals from off-site storage ........ 11
Refiles ........ 11
Outcarded Records ........ 11
Compliance Audits ........ 12
E-Mail ........ 12
Imaging ........ 13

# RECORDS MANAGEMENT PROGRAM OVERVIEW

The following guidelines explain how to use MCI's Records Retention Schedule (RRS), how to manage MCI's records *in all media forms*, how and when to send records to off-site storage.

The RRS has been approved by the Law & Public Policy (LPP) department as the company-wide policy on records retention. Use the RRS to determine which records your department is responsible for retaining, and for how long.

The objectives of the Records Management Program are to:

- Ensure that MCI is meeting all local, state, federal and operational record-keeping requirements.
- Reduce costs by ensuring records will be available in the event of a litigation or financial issue.
- Efficiently identifies records that must be retained and specifying their life cycle.
- Compliance is mandatory.

Records & Information Management's responsibilities are to:

- Develop record management policies and procedures.
- Assist in identifying and protecting vital records.
- Monitor compliance with record management procedures and the RRS.
- Research and assign retention periods to records company-wide.
- Educate and train employees in all areas of record management.
- Provide assistance in storage, retrieval and disposition of records.
- Work with legal, tax and storage vendors to dispose of eligible records.
- Maintain/monitor a database of records stored off-site.
- Recover records which have been withdrawn for an excessive amount of time.

MCIWC031873

# GUIDELINES

Π *Throughout this guideline numerous references are made to the RIM web site. If you do not have access to this website yet, please contact RIM to assist with any service requests.*

*Adherence to the Records Program*

In order to ensure MCI's compliance with all local, state and federal record-keeping requirements and for MCI's operational needs, all MCI employees must adhere to the Record Management Program.

*What is a Record?*

A record is any or all recorded information, regardless of medium or specific characteristics, created, received, used or distributed by MCI in the course of its business. This includes – but is not limited to - paper, microfilm, tape, microfiche, e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.

Only the *official copyholder* of a record is required to retain a record for the total retention period indicated in the MCI Record Retention Schedule (RRS). If you maintain originals, you are the official copyholder. Creating a record does not mean you are the official copyholder; you must also maintain the original. Copies should not be stored or kept once your operational need is completed, there are no exceptions.

Vital Records

A Vital Record is the recorded information that is essential for the continuation or reconstruction of an organization. Vital records help establish the legal and financial position of MCI, and are critical to preserving the rights of the organization, its employees, customers and stockholders. Roughly two to six percent, of MCI's records are identified as "Vital."

When reviewing the Records Retention Schedule (RRS) (discussed later), if you see a "V" in the Comments column, this means that particular record is a vital record.

**The Records Retention Schedule (RRS)**

The RRS is a tool to determine time frames for the retention of *all* records and information created, received, used, and distributed by MCI. It is modified on an as needed basis by the Records Management Department, Law & Public Policy (LPP) and Tax departments, to reflect changes in the company's organizational structure, and/or changes in applicable record-keeping laws/regulations. The RRS is the *only* reference tool used in determining retention/disposition actions for MCI's records. Retention determinations independent of the RRS are strictly prohibited. You will also use the RRS to determine the Record Series number for specific records when placing records in storage.

As shown in the example below, the RRS groups "like records" first by major function (Primary Classification), and then by type of record within that function. The RRS gives descriptions of each record series, along with the *total retention period* for which records must be retained before consideration for disposition.

**PRIMARY CLASSIFICATION: ACCOUNTING**

Page 1

| RS # | RECORD SERIES | DEFINITION | TOTAL | COM |
|---|---|---|---|---|
| | 1 ACCOUNTING | The management of receipts and expenditures, cost accounting and payroll, and the auditing of said functions. | | |
| 5 | 2 Audits | Audits of accounting records and/or procedures, including backup materials such as Internal Document Requests (IDRs) | C + 7 | FA, V |
| | 2 Cash | | | |
| 12 | 3 Accruals | Information concerning cash forecast and related accounts, such as Cash Forecast Reports, Cash Accrual Reports, etc. | 1 | |

RS # – The Record Series Number that uniquely identifies each type of record.

RECORD SERIES - A grouping of like records by type.

DEFINITION - Used to describe a particular Record Series, often includes sample document types.

TOTAL - The total length of time (number of years) that a Record Series must be retained.

> **Note:** Some time periods are preceded by a letter. The letter is an abbreviation for a record occurrence (i.e., termination or completion of a contract). For example, C + 15 for a contract means that the contract needs to be retained for 15 years after the contract is canceled, completed or closed. There is a key to these abbreviations ("*Key to Comments and Abbreviations*") at the end of the RRS listing.

COM - Comments concerning any unique retention requirements affecting a Record Series (see the "*Key to Comments and Abbreviations*").

**Record Series Number**

Under the Primary Classifications, groupings of like records have been assigned unique Records Series names, numbers, and definitions. For example:

| RS# | | |
|---|---|---|
| | 1 HUMAN RESOURCES | |
| | 2 Benefits | |
| | 3 Disability | |
| 356 | 4 Claims | Documentation concerning disability claims, including short or long term claims. |
| | 1 LEGAL | |
| | 2 Contracts/Agreements | |

| | | |
|---|---|---|
| 284 | 3 Purchase | Legally binding agreements/contracts between MCI and another party for goods, such as purchase of hardware and software; backup materials such as bids, proposals, vendor information, etc. |

**Locate the Records Series (RS#) number associated with your record:**

1) Scan your record to gain an understanding of the main topic.

2) Identify the Primary Classification for your record, i.e., is this an accounting record, human resources, financial etc.?

3) Review the record classifications under your selected Primary that best describes your record and identify the associated RS#.

**Locate a Record Series number using the website:**

To locate a record series number using the website, go to the Searchable Records Retention Schedule. The searchable RRS will allow you to search for a record series number using a key word in the definition field.

Once you have obtained your search results, read each record series description to determine which record series is applicable to your type of record.

**Destruction Review Date**

Using the example shown below, the destruction review date for a particular record series is determined as follows:

*Example*:

| RS# | RECORDS SERIES | TOTAL | COM |
|---|---|---|---|
| | 1 LEGAL | | |
| | 2 Contracts/Agreements | | |
| 285 | 3 Other | C + 15 | SL, V |

A purchase agreement put into effect in 1992, and closed in 1995, would be *eligible* for destruction in 2010 (15 years after it is closed).

If you are the official copyholder of RS# 285, the total retention period is C+15.

You are only responsible for the disposal of records within your office. Any records off-site that are eligible for destruction (have met their retention requirements), will be destroyed by Records Management after being reviewed by LPP and Tax.

**<u>Off-Site Storage</u>**

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Off-site storage is to be used for inactive records. If you need to place active records into storage due to space limitations on-site, please contact RIM for special storage procedures.

MCI has approved off-site storage contracts with several different vendors.
Iron Mountain is MCI's national vendor for off-site record storage. There are five other storage vendors:

Kenwood Records Management, Cedar Rapids, IA
Storage Plus (Five R, Inc.), Tulsa, OK
Mississippi Filing, Jackson, MS.
Datalok, Carson, CA
Recall Storage, San Leanandro, CA

**Off-Site Storage Services**

MCI's off-site storage vendors offer a number of services. RIM encourages the use of off-site storage for all records with a retention requirement. Each off-site storage facility is designed to handle paper records, as well as electronic media, and is better prepared to handle disasters, such as flood, tornadoes, and fire, then any MCI facility.

The advantages of off-site storage are multiple. The obvious is to free-up on-site storage space. The storage vendors contracted by MCI respond to requests for pick-up and retrieval within 24-48 hours, so your records are readily accessible. Cartons along with their descriptive data are entered in to a database upon receipt at the vendor's site. MCI has the ability to query this data in order locate records when needed.

Records Management (RIM) pays all costs relating to off-site storage services, except for two-hour rush requests and when the requestor or his/her stated alternate are not available when the vendor responds to a request, these instances are charged back to your department.

The most important advantage is that MCI's records are reviewed under an established and approved policy. The use of off-site storage also minimizes any risks MCI may encounter related to their records. Since all records in storage must be identified using an inventory form which identifies the record type, required retention through the record series and full description, we know what we have, what we have to keep and where it is. Knowing where our records are is essential for MCI in order to do business effectively and efficiently.

**Handling Instructions for Paper, Microform, and Electronic Records**

Paper Records:

Place all records in manila file folders. Do not send cartons of loose papers, ring binders or hanging folders. Computer printouts should be removed from binders and laid flat in cartons.

All Managers' working files for employees should be sent to the HR Fileroom (9835/700) once an employee no longer works for the company or your department. If an employee transfers to another department, you should send any manager notes regarding the employee

to the HR Fileroom. It is acceptable; however, to give the new manager the employee's attendance record, performance review and PAF, but you cannot give those notes or written comments that are about or concern the employee.

For the records within your department that are considered copies, there is no retention value. This includes records such as day-timers, appointment books, calendars, telephone messages, reports generated from the mainframe, personal meeting notes and copies of any records where the original was sent to another department. These types of records should not be retained for longer than one year.

Microform:

Place microfilm in protective cartons, and microfiche in jackets. Microfilm, microfiche, tape, imaging platters, and other types of electronic media need to be stored in the vendor's climate control vault.

Electronic Records:

Because of their small size relative to the amount of information they contain, diskettes and magnetic tapes may not require transfer to off-site storage. If such records are to be moved off-site, they should be stored in closed cartons, in humidity/temperature controlled storage sites. MCI's approved storage vendors are equipped to handle this type of storage. Do not use diskettes for long-term storage, since they are not designed for this purpose.

If decommissioning a system, several factors need to be reviewed. If the system contains financial information/data, the tax department needs to be notified before the system is decommissioned. Any data contained on the decommissioned system that has a retention requirement must be retrievable and readable until it has fulfilled its retention requirement. The data does not have to be in the same format as it was on the decommissioned system; however, none of the data may be altered. If the data is in a database format, the database may be saved in a flat file format, so that it may be read on any system. Documentation of the data conversion should be created to prove that it was only converted, and that the value or significance of the data had not been changed.

If data contained on a system can only be read with a particular program, the program must be retained for the life of the system, and then migrated to the new system, or until the retention requirement for the data has been reached.

**When to send records to off-site storage**

At least once a year, usually following the end of the calendar or fiscal year, the RRS should be reviewed by the department's Manager to determine which of their records should be transferred to off-site storage or destroyed.

It is recommended that when your department's operational need for any records is complete, and need to be retained according to the RRS, the records should be transferred to off-site storage for safekeeping.

**Storage Procedures**

**Pick-up** / Delivery Schedule

Storage vendors will pick-up and deliver your cartons. All requested orders that are sent to the storage vendor by 4:00 p.m. will be delivered or picked-up on the next work day. Normal hours of operation are Monday through Friday 8:00 a.m. to 5:00 p.m. locally (except holidays). If a storage vendor cannot fulfill a request because you or your alternate contact are not available, your department will be charged for all fees. NO RUSH OR EMERGENCY RETRIEVALS WILL BE ACCEPTED WITHOUT PRIOR APPROVAL FROM RIM. If you have an emergency situation, please contact Phil Hasselvander at Vnet 806-3398 (703-886-3398) or Chris Moses at Vnet 806-7117 (703-886-7117).

**New Storage**

Obtain off-site storage supplies (approved record storage cartons and barcode labels) from your storage vendor through the supply request form on RIM's website.

The MCI Box Inventory Form can also be obtained on RIM's website.

Follow these steps to send cartons to storage:

1. Complete the Inventory Form (see instructions below).

2. Two identical peel-off, die cut, barcode labels are provided. Affix the small barcode label to the Inventory Form where indicated. This barcode number is your carton number. This is the carton number you will use to retrieve and refile your cartons.

3. Affix the larger barcode label to the narrow side of the carton under the hold handle.

4. The inventory form is not a two-part form. After affixing the barcode label, make a copy of this form for your files.

5. Schedule a pick-up by completing the new storage pick-up request form on the RIM website. If you are not sure which city you should choose, please contact Phil Hasselvander at Vnet 806-3398 (703-886-3398) or Chris Moses at Vnet 806-7117 (703-886-7117).

6. You must EMAIL your inventory form to RIM at rim@mci.com . Once RIM has reviewed your inventory form to ensure that it has been completed properly, RIM will forward your pick-up request to the storage vendor. This change in procedure is to ensure that the records are completely identifiable, easily retrievable and the information required for retention and destruction review is correct.

**Complete the Inventory Form as follows:**

Check whether it is Standard Storage or Climate Control Storage at the top of the form. Climate Control is used for electronic media. Do not mix electronic records with paper records. If you have both standard storage and climate control storage, you need to fill out a separate form for each type of storage.

ACCT. #: Fill in the storage vendor account number for your area. See the Storage Vendor Telephone Directory and Contact List for account numbers in your area.

PREPARED BY: Fill in your name.

PHONE NO.: Fill in your outside telephone number here.

DATE: Fill in the date the form is filled out.

DEPT: Fill in your department name or four-digit department number. Location number is not needed.

CARTON BARCODE: Place small die cut barcode label from the large barcode label sheet here.

RECORD CLASSIFICATION CODE: Fill in the Record Series # from MCI's Records Retention Schedule. RIM's website has a RS Code search function to help you identify code numbers; the link is below.

https://teamnet2.mcilink.com/departments/rim/retention/retention_form.html

DATE RANGE: Fill in From and Thru dates of records in carton. For example, if a box contains invoices from June 1996 to September 1996, you should fill in the "From" field with 06/01/1996 and the "Thru" field with 09/30/1996. If you only have a year, then span the entire year (i.e., 01/01/96 to 12/31/96).

RETENTION CODE: Leave blank, unless instructed otherwise by RIM. You would need to complete this field if you are storing active records, or records under litigation or audit; therefore, please call RIM for the code.

DESCRIPTION: 55 characters of descriptive information that FULLY explains the records in the carton. The description should be able to identify, to anyone within the company, the contents of the carton.

IMPORTANT:

The Inventory form is used to identify carton contents and ownership. It is also used to input carton information into MCI's national database of records. All storage vendors have been instructed, by RIM, to refuse pick-up of new storage cartons without accompanying inventory forms. In addition, all storage vendors have been instructed to return any cartons with an incomplete inventory form. Unique abbreviations, acronyms, numbers without qualifiers, individuals' names, terms such as: miscellaneous files, general files, desk files, old files, office files are unacceptable. Cartons containing these types of descriptions or cartons picked-up with no inventory forms will be returned to you. All costs associated with returning cartons to you will be charged to your department. If you have questions regarding acceptable/unacceptable descriptions, contact Phil Hasselvander at Vnet 806-3398 (703-886-3398) or Chris Moses at Vnet 806-7117 (703-886-7117).

**Retrievals**

Retrievals are those cartons that you wish to have recalled from the storage vendor and returned to you for temporary use. To retrieve cartons from storage, use the retrieval request

form on the RIM website. You will need to indicate which carton numbers you want retrieved from storage and delivered to you. You may only retrieve records stored by your department.

A department may not purge any records from a box that was retrieved from storage. Cartons that are retrieved must be returned to storage within 10 business days. For an exception to this policy, send an email to RIM at rim@mci.com with an explanation and justification for longer retention within the department.

**Refiles**

Refiles are those cartons previously retrieved from the storage vendor that you wish to have re-stored. To refile records with your storage vendor, use the pick-up request form on the RIM website to schedule carton pick-ups. To add cartons to your pick-up order, you must prepare a new request form.

**Outcarded Records**

All cartons retrieved from storage must be returned to the corrected storage vendor in 10 business days. If a department needs an extension, a written justification must be sent to RIM (rim@mci.com) from a Sr. Manager level or above with confirmation that all cartons are still in your possession and in tact. RIM receives a report, by contract, from each of the storage vendors identifying end-users who have withdrawn records past due. An email will be sent to those end-users who have had their records past due of the 10 limit to withdrawal. Sometimes an employee leaves the company while a box has been withdrawn in their name, in which case seek the alternate contact on the original retrieval request; if the alternate contact can't be found then the next manager up. In some cases a RIM staff member or someone from Facilities will have to be contacted, if no one is willing to claim the records, and a request to refile the said boxes would then be submitted.

**Compliance Audits**

All departments within MCI will be periodically audited by Records Management staff to:

- Ensure department compliance with record management policy and procedures.
- Is the department retaining their records for the correct period of time? The department needs to be accessed to ensure that they are not retaining their records too long nor too short a period of time.
- Is the department storing their records off-site properly? Can records be retrieved in a timely and efficient manner?
- Is the department destroying on-site records that have surpassed their retention?
- Is the department backing-up their PCs? Does the department maintain / retain e-mail properly?
- Review records retention period to comply with current financial, legal, operational/ revise as needed.

There are other criteria for passing the audit; however, the most important criteria is whether or not the department is retaining records they are responsible for, and retaining them for the right period of time.

Departments are selected for the audit at random (usually one out of each segment within MCI). The auditor performs background research on the department, such as finding out what types of records the department has, if they have off-site storage, etc. An e-mail, along with the audit questionnaire, is sent to the department requesting a meeting. During the meeting, the questionnaire is reviewed, along with follow-up questions. At the end of the meeting, the department is accessed for compliance.

Once the department has been audited, a memorandum is created stating the results and, any recommendations. The memorandum is sent to the Interviewee with a copy going to their manager. If the department passes the audit, a certificate is sent along with the memorandum. Departments that pass the audit are audited every five years. If a department fails the audit, the memorandum will contain reasons for noncompliance, recommendations to become compliant, and a re-audit date. Departments that fail are reviewed after three months to ensure they are moving forward with bringing their department into compliance, and then formally audited again nine months later.

E-Mail

The policy for electronic mail messages sent or received by company employees covers the creation and use of electronic messages, as well as access to and disclosure of these messages.

The policy includes all internal electronic mail systems, such as LANs, Outlook, Lotus Express, etc. The policy applies to full-time, part-time, and temporary employees, persons employed by temporary employment agencies, and to all third-party contractors with access to MCI MCI's electronic mail messaging systems.

All electronic communication systems and all communication and information transmitted by, received from, or stored in these systems are the property of the Company, and as such are to be used solely for job-related purposes.

Because e-mail encompasses the full array of types of communications, the retention period is based on the content of the message in question. Thus, for example, an e-mail message between a MCI employee and a vendor must be retained for the time period specified for vendor correspondence. Unless otherwise covered by a specific retention requirement, internal e-mail need not be retained beyond its useful life unless it is relevant to ongoing litigation, an enforcement proceeding or an audit. Under such circumstances, you typically will be notified of the obligation to retain until further notice the pertinent hard copy and electronically stored materials.

*Imaging*

If your department is interested in imaging their paper records, please call Records Management. We will work with you in determining your needs, whether your department needs to purchase the system, or if your documents can be placed on another imaging system within the company.

If you currently have an imaging system or are initiating one within your department, there may be IRS regulations or legal criteria that should be followed. A binder with the following data must be created and maintained on-site:

1. A record of where, when, and on what equipment any document was imaged will be maintained (to be retained in history format).
2. An accurate chronological record of changes to the system. This must be maintained for as long as the system is running.
3. Evidence of procedures ensuring quality, reliability and the integrity of the documents being imaged, including audit procedures.
4. A list of management personnel responsible for the supervision of the system (systems and record imaging). Provide names, dates, and titles. This needs to be updated when the "players" change.
5. Documentation on the initial system, and any significant change to the system. Any major changes need to be discussed with the Tax department.
6. A description of the optical platters used for storage, and location of where back-up copies will be maintained.
7. Identify the location of records that are not or cannot be imaged.
8. Procedures for retrieving records from imaging system.

Originals of imaged documents need to be retained if the retention period is longer than 7 years. Imaging systems should be used for day-to-day use and the need for quick retrieval, not for long-term storage.

If implementing an imaging system for financial records, IRS Rev. Proc. 97-22 and 98-25 must be followed. Records Management has a copy of both revenue procedures, as does the tax department.

Back-up copies of imaging platters or electronic media (CD ROM, tape, diskette, etc.) must be retained away from the location of where they are being created or used. RIM recommends that the back-ups be placed in off-site storage within a climate-controlled vault. Much like tape storage, there should be a *floor copy* that is used as the working copy, and a copy used for disaster recovery. If anything happens to the *floor copy*, the disaster recovery copy is pulled from storage, copied, and returned to storage.

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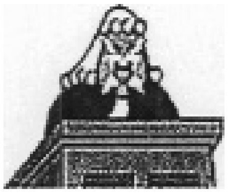

Policies & Procedures

**RIM is your source for any questions or directions pertaining to the maintenance, retention, storage and destruction of all MCI records.**

Please contact RIM….we are here to assist you.

Following is the Memo, approved by Michael Cipichio, is accompanying the Questionnaire that follows.

In an effort to promote awareness of and conformance with MCI's Record Compliance Program and policies, Records and Information Management (RIM) requires your support. RIM has produced a questionnaire, which can be accessed at https://teamnet2.mcilink.com/departments/rim/inform/questionnaire.html Its purpose is to assess your organization's functions, its records, and its record retention practices. We ask that you assist RIM to ensure that your organization is aware of and adheres to our Record Compliance Program. Please return the completed questionnaire to James Green. By ______________________ *Each Department must complete a Questionnaire*.

Proper retention of records is critical from a financial, legal and operational standpoint. Accordingly, as a MCI employee, you are responsible for understanding the policy and complying with the program. The Company must adhere to all local, state, federal and operational record keeping requirements, therefore, compliance is mandatory. The program also offers many practical advantages, including opportunities for off-site storage that can save valuable office and computer server space while improving office workflow.

Information concerning MCI's document retention policy and program is located at https://teamnet2.mcilink.com/departments/rim. This website contains valuable information including, but not limited to:

1. Company policies and procedures on records management.
2. A searchable retention schedule
3. Guidance on what records are considered confidential

Your support is appreciated. If you have any questions or comments about the program or the questionnaire, please contact any of our RIM personal. The directory for all RIM staff is located at https://teamnet2.mcilink.com/departments/rim/phone/contacts.html.

## RECORDS MANAGEMENT QUESTIONNAIRE

**A separate questionnaire must be completed by each department.**

After RIM has reviewed the completed questionnaire, you will be contacted by telephone with follow-up questions and pertinent records guidance where necessary.

Date:

Company Name:

Name: Title:

Phone Number: Email address:

Department Name (and number)/Division: Address:

Senior Manager's Name: Email address:

Director's Name: Email address:

At various points in this questionnaire you may be requested to provide a copy of additional materials; please use the following address:

MCI
**Attn: James Green**
22001 Loudoun Country Parkway
D1-3-375
Ashburn, VA 20147

Or email: james.green@mci.com

1. What category does your department fall under?
   Pick one:

   Accounting
   Administration
   Corporate
   Finance
   Human Resources
   Legal
   **Marketing**
   Sales
   Network Services
   Systems
   Tax

2. What is your department's primary function?



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3. What types of records/information is your department responsible for?

4. From *whom/where* does your department receive records/information (e.g., department name, outside company/agency name, etc.)?

5. In *what form* are the records/information received?
   Pick all that apply:

| | |
|---|---|
| Paper | Mainframe |
| Microfiche | Mid-Range |
| Microfilm | Diskette |
| Tape | Electronic |
| EDI | CD |
| Optical | |

6. To whom does your department send records/information (e.g., department name, outside company/agency name, etc.)?

7. In what form is the records/information sent?
   Pick all that apply:

| | |
|---|---|
| Paper | Mainframe |
| Microfiche | Mid-Range |
| Microfilm | Diskette |
| Tape | Electronic |
| EDI | CD |
| Optical | |

8. In what form do your records/information reside?
   Pick all that apply:

| | |
|---|---|
| Paper | Mainframe |
| Microfiche | Mid-Range |
| Microfilm | Diskette |
| Tape | Electronic |
| EDI | CD |
| Optical | |

9. Has the department ever inventoried all of its records?
   a. Yes
   b. No